

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

WOPIRB, LLC,

Debtor.

Case No. 23-12722-mdc

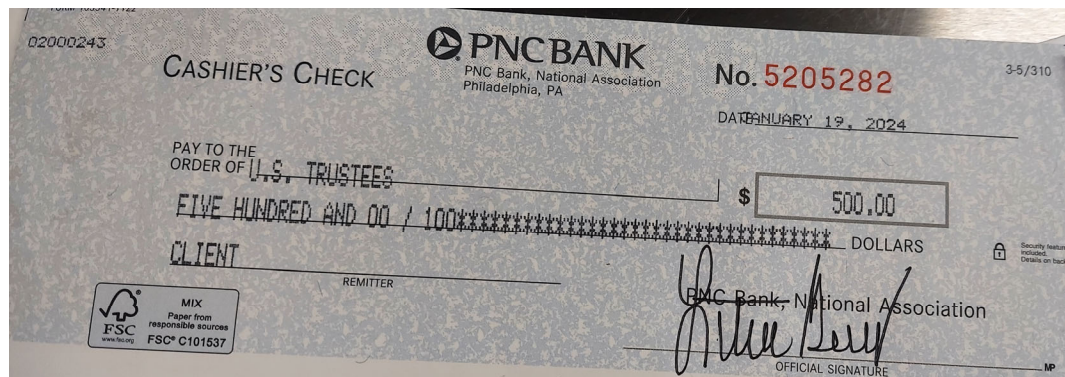
Chapter 11

Response to ECF No. 31

**Debtor's Response to United States Trustee's
Motion to Dismiss or Convert Case**

AND NOW, Debtor WOPIRB, LLC, by and through its attorney, hereby responds to the United States Trustee's Motion to Dismiss or Convert Case, and states as follows:

1. The Debtor opposes the motion.
2. The Debtor recently filed all operating reports that have become due since this case was filed.
3. The Debtor recently requested Court approval to retain a consultant who will help the Debtor obtain the financing necessary to move this case forward.
4. The Debtor paid \$500.00 to the U.S. Trustee as payment for quarterly fees on January 19, 2024.



NOW, THEREFORE, the Debtor asks this Court to deny the motion in the form of order attached.

Date: March 5, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Response to the United States Trustee's Motion to Dismiss or Convert Case to be served on the U.S. Trustee through the CM/ECF system along with all attachments.

Date: March 5, 2024

/s/ Michael A. Cibik
Michael A. Cibik